

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
SEATTLE DIVISION

ZUNUM AERO, INC.,

Plaintiff,

v.

THE BOEING COMPANY; BOEING  
HORIZONX VENTURES, LLC; SAFRAN,  
S.A.; SAFRAN CORPORATE VENTURES,  
S.A.S.; SAFRAN ELECTRICAL &  
POWER, S.A.S.; SAFRAN HELICOPTER  
ENGINES, SASU,

Defendants.

) Civil Action No. 2:21-cv-00896

)

) **STIPULATED MOTION FOR AN**

) **ORDER EXTENDING TIME FOR**

) **SPECIALLY APPEARING**

) **DEFENDANTS SAFRAN, S.A.; SAFRAN**

) **CORPORATE VENTURES, S.A.S.;**

) **SAFRAN ELECTRICAL & POWER,**

) **S.A.S.; AND SAFRAN HELICOPTER**

) **ENGINES, S.A.S.U. TO MOVE, PLEAD,**

) **OR OTHERWISE RESPOND TO**

) **PLAINTIFF ZUNUM AERO INC.'S**

) **FIRST AMENDED COMPLAINT BY 30**

) **DAYS TO SEPTEMBER 17, 2021**

)

) **NOTED ON MOTION CALENDAR:**

) **August 9, 2021 (Local Rule 7(d)(1))**

1 Pursuant to Local Civil Rules 7(j) and 10(g), specially appearing defendants Safran  
2 S.A., Safran Corporate Ventures, S.A.S. (“SCV”), Safran Electrical & Power, S.A.S.  
3 (“SEP”), and Safran Helicopter Engines, S.A.S.U. (“SHE”) (collectively, the “Safran  
4 Defendants”) and plaintiff Zunum Aero, Inc. (“Zunum”) hereby submit this stipulated  
5 motion to extend the Safran Defendants’ time to move, plead, or otherwise respond to the  
6 First Amended Complaint (“FAC”) by 30 days, to September 17, 2021.

7 WHEREAS, pursuant to this Court’s Order, dated July 9, 2021, granting the parties’  
8 first stipulated motion to extend time, the Safran Defendants’ current deadline to respond to  
9 the FAC is August 18, 2021. *See* Doc. 11.

10 WHEREAS, good cause exists to extend the Safran Defendants’ deadline to move,  
11 plead, or otherwise respond to the FAC because Zunum and the Safran Defendants continue  
12 to discuss a potential resolution of the Safran Defendants’ jurisdictional defenses, and an  
13 additional extension of 30 days of the Safran Defendants’ deadline to move, plead, or  
14 otherwise respond to the FAC would provide the parties with additional time needed to  
15 discuss a resolution of these defenses and potentially avoid the need to expend party and  
16 judicial resources on motion practice (including jurisdictional motion(s) and motion(s) to  
17 compel arbitration) in response to the FAC.

18 WHEREAS, good cause also exists because, since the Court entered its order on July  
19 9, 2021, granting the previous extension of time to respond to the FAC, on July 15, 2021,  
20 Zunum filed a motion to remand this case to the state court and the motion will be fully  
21 briefed on August 6, 2021. If the parties are unable to resolve the Safran Defendants’  
22

1 jurisdictional defenses, the Safran Defendants submit that they should not be required to  
 2 prepare their prospective jurisdictional motion(s) and motion(s) to compel arbitration until  
 3 after this Court rules on Zunum's motion to remand this case to state court, as the briefing on  
 4 those motions will differ depending on the forum.

5 WHEREAS, by entering into this stipulation, no Safran Defendant makes a general  
 6 appearance, submits to the jurisdiction of this Court, or waives any right or defense. The  
 7 Safran Defendants reserve their right to seek additional time to respond if, by the requested  
 8 extended deadline, the Court has not yet ruled on Zunum's motion to remand.

9 WHEREAS, by entering into this stipulation, Zunum expressly reserves all rights to  
 10 challenge the removal of this action to this Court.

11 WHEREAS, this stipulated motion is filed in good faith and not for purposes of  
 12 delay, and will not alter any dates or schedules previously set by this Court.

13 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, by and  
 14 among Zunum and the Safran Defendants, subject to the Court's approval, that the deadline  
 15 for the Safran Defendants to move, plead, or otherwise respond to plaintiff's FAC is  
 16 extended by 30 days to September 17, 2021.

17 Dated: August 9, 2021

s/ Catherine S. Simonsen  
 Catherine S. Simonsen (WSBA # 45552)  
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 forthcoming)  
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22 STIPULATED MOTION TO EXTEND TIME – 3

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Dated: August 9, 2021

s/ Eliot M. Harris  
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Attorneys for Plaintiff  
ZUNUM AERO INC.

JLR ~~PROPOSED~~ ORDER

**IT IS SO ORDERED.**

Dated this 10th day of August, 2021



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JAMES L. ROBART  
UNITED STATES DISTRICT JUDGE